Eric H. Gibbs (SBN 178658) 1 ehg@classlawgroup.com 2 David Stein (SBN 257465) 3 ds@classlawgroup.com GIBBS LAW GROUP LLP 4 505 14th Street, Suite 1110 5 Oakland, California 94612 Telephone: (510) 350-9700 6 Facsimile: (510) 350-9701 7 8 Kim D. Stephens (pro hac vice) kstephens@tousley.com 9 Jason T. Dennett (pro hac vice) 10 jdennett@tousley.com 11 **TOUSLEY BRAIN STEPHENS PLLC** 1700 7th Avenue, Suite 2200 12 Seattle, Washington 98101 13 Telephone: (206) 682-5600 Facsimile: (206) 682-2992 14 15 Proposed Class Counsel 16 UNITED STATES DISTRICT COURT 17 CENTRAL DISTRICT OF CALIFORNIA 18 BILLY GLENN, et al., Case No. 8:15-cv-02052-DOC-KES 19 20 PLAINTIFFS' NOTICE OF MOTION Plaintiffs, AND MOTION FOR FINAL 21 v. **SETTLEMENT APPROVAL AND** 22 AWARD OF ATTORNEY'S FEES, HYUNDAI MOTOR AMERICA, et 23 LITIGATION COSTS, AND al., SERVICE AWARDS 24 Defendants. 25 Date: August 12, 2019 Time: 8:30 a.m. 26 Judge: The Hon. David O. Carter 27 Courtroom: 9D 28

NOTICE OF MOTION AND MOT. FOR FINAL APPROVAL, FEES, COSTS, & SERVICE AWARDS

CASE NO. 8:15-CV-02052-DOC-KES

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 12, 2019, or as soon thereafter as the matter may be heard, before the Honorable David O. Carter, District Judge of the United States District Court for the Central District of California, in Courtroom 9D, Ronald Reagan Federal Building, United States Courthouse, 411 West Fourth Street, Santa Ana, California 92701, Plaintiffs Billy Glenn, Kim Fama, Jahan Mulla, Kathy Warburton, Roxana Fitzmaurice, and Corinne Kane will, and hereby do move for an order of the Court to certify a settlement class, finally approve the parties' proposed classwide settlement, and approve the negotiated award of \$5,400,000 (inclusive of attorney's fees, reimbursement of over \$700,00 in litigation costs, and service awards of \$5,000 each to Plaintiffs Glenn, Fama, Mulla, Warburton, Fitzmaurice, and Kane).

Plaintiffs' motion is based on this notice; the accompanying memorandum of points and authorities; the previously-filed declaration of David Stein, dated January 30, 2019 (ECF 264); accompanying declarations of David Stein, Jason Dennett, Gregory F. Coleman, Paul Peel, and Kirk Kleckner; the Proposed Final Order and Judgment; and all other papers filed and proceedings had in this action.

DATED: May 28, 2019

Respectfully submitted,

GIBBS LAW GROUP LLP

By: /s/ David Stein

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